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A practical example on the establishment of a temporarily red lock to separate GSPP and non-GSPP entities.

Introduction

The availability of GSPP-seeds can be limited for various reasons. A seed company for instance that is not (yet) accredited is not qualified to deliver GSPP-seeds. Can a plant raiser grow non-GSPP seeds if a tomato grower orders such lot? Direct commercial benefits often complicate the decision making of a plant raiser to become or stay GSPP accredited. This document gives an explanation on how a GSPP plant raiser can interpret the GSPP-standard to implement a red area to grow non-GSPP seeds.

According to the standard

The use of non-GSPP seeds directly implicates the assumption that Cmm can be present in the specific seed lot. Therefore extra measures have to be taken if a GSPP-plant raiser decides to grow a non-GSPP lot. Under any circumstances this has to be done in a **red area**. If a GSPP-plant raiser decides to grow a non-GSPP lot a red lock must be created in such a way that the specific lot stays in the **red area** at all times. The GSPP Standard defines the red area as an uncontrolled area where the assumption must be made that Cmm is present. To prevent cross contamination a (or several) red lock(s) must be created. For a full explanation of these terms see the GSPP Standard definitions, Annex 14.7 and Annex 14.5 chapter 4.1 and 4.2 "facilities".

If for practical reasons the site demands a (re-)establishment of the green area, after use as a red area, a **temporary red lock** can be used. A temporary red lock is specifically mentioned under Annex 14.5 in chapter 4.2. A red lock can be (re-)established in multiple ways as the situation will vary per site or company. For several situations an explanation is given which also can be found in chapter 4.2 of the annex 14.5. In this same chapter clarification is given regarding internal or external audit(s) for each situation. These red locks have to comply to all paragraphs of Annex 14.5, but in specific paragraph 2, 3, 4.2 and 4.3.

What does this mean for a GSPP plant raiser?

Taking the remarks made above into account, several conclusions can be drawn if a GSPP plant raiser decides to grow a non-GSPP lot, behind a (temporary) red lock, on a GSPP site.

1. It is mandatory to notify the GSPP secretariat of the emplacement of a temporary red lock.
2. A risk assessment has to be made for the production of the specific lot and all control measures. This means potential risks must be addressed. Some examples are listed below but vary per site/company and this list is not extensive:
 - a. Create a red lock surrounding the specific lot or area e.g with plastic in such a way that Cmm is not able to spread to the green area.
 - b. Change into clean clothes after entering or leaving the red zone.

- c. Prevent cross contamination if a lot must be repositioned, by disinfecting transportation vehicles like forklifts and concrete floors.
 - d. Implement adequate hygiene measures after moving the lot, clean and disinfect floors, etc.
 - e. Implement adequate hygiene measures after using materials.
 - f. If recirculation is applied, water must be disinfected before reuse in the green area.
 - g. Personal instructions towards employees.
3. A layout has to be presented to clarify the temporary red locks.
 4. The re-establishment must be audited internally or externally, depending on the situation.
 5. Auditing and registration must take place in the GSPP accredited period after re-establishment of the red lock.
 6. A thorough explanation of the situation must be available in writing and presented during the audit.

Risks

Weighing the commercial benefits of sowing a non-GSPP lot versus the potential risks are up to the plant raiser. If control measures or red locks fail, a major non conformity will be written. It is of utmost importance that the GSPP plant raiser is aware of the fact that most actions regarding cross contamination cannot be undone once they have occurred.